



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

ELECTRONIC MAIL ONLY

January 13, 2022

Ms. Lori E. Sanders,
Chief Environmental Counsel
DuPont de Nemours, Inc.
974 Centre Road
Wilmington, DE 19805
Lori.E.Sanders@dupont.com

Re: Request for Information Pursuant to Section 104(e)(2) of CERCLA

Dear Ms. Sanders:

Addressing per-and polyfluoroalkyl substances (collectively "PFAS") is a top priority for the U.S. Environmental Protection Agency (EPA or Agency). As part of EPA's strategy to address PFAS contamination, the Agency intends to work with DuPont de Nemours, Inc. ("DuPont") and other stakeholders to understand the full nature and extent of PFAS contamination that may be present in soil, groundwater, surface water, and sediment on and adjacent to the fifteen locations listed below. These fifteen locations are facilities owned and/or operated by DuPont that EPA has reason to believe may have produced, managed, used, handled, released, or have the potential to release PFAS. EPA identified these fifteen facilities based on information DuPont provided in response to information requests sent on August 8, 2019, pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318.

As an important step in EPA's strategy to address PFAS contamination, this letter seeks to obtain additional existing information and data on the current and historic operations at the fifteen facilities. EPA has an ongoing working relationship with DuPont, and the Agency has received a significant amount of information related to the Washington Works and Chambers Works facilities. If any information requested in this letter relates to information on Washington Works, Chambers Works, or another facility previously provided to EPA in response to other information requests and/or through DuPont's ongoing working relationship with the Agency, you will not need to resubmit that information. In such instances, please identify when and to whom at EPA that information was provided.

To protect communities and the environment, EPA intends to work with DuPont to gather information on the fifteen facilities listed below and the presence of certain PFAS, which will be referred to in this letter as Chemicals of Potential Concern (COPC)¹, at those facilities to evaluate potential releases of COPC at those facilities. EPA will use the information and data obtained through this letter to determine if further investigations of threatened releases of COPC or response actions to address releases of COPC at any of the facilities are necessary to protect human health and the environment.

By this letter, the EPA requests information from DuPont under Section 104(e)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, 42 U.S.C. § 9604(e)(2). Section 104(e)(2) of CERCLA authorizes EPA to require you to submit certain information related to hazardous substances and/or pollutants or contaminants. Pursuant to CERCLA Section 104(e)(2), the EPA requires that you provide the information requested in Enclosure D to this letter, using the instructions and definitions included in Enclosures A and B. This information is required to evaluate the nature and extent of releases or threatened releases of hazardous substances and/or pollutants or contaminants from the fifteen facilities. Those facilities include:

1. Marlborough, MA
2. Manati, PR
3. Buffalo, NY (Yerkes Plant)
4. Wilmington, DE (Experimental Station)
5. Richmond, VA (Spruance)
6. Towanda, PA
7. Newark, DE (Tralee Park)
8. Old Hickory, TN
9. Greensboro, NC
10. Circleville, OH
11. Pasadena, TX (Bayport)
12. Fort Madison, IA
13. Deepwater, NJ (Chambers Works)
14. Parlin, NJ
15. Washington, WV (Washington Works)

¹ For the purposes of this letter, the term Chemicals of Potential Concern (COPC) shall include the following PFAS: Perfluorooctadecanoic acid (PFODA) CASRN 16517-11-6, Perfluorotetradecanoic acid (PFTetDA) CASRN 376-06-7, Perfluorododecanoic acid (PFDoDA) CASRN 307-55-1, Perfluoroundecanoic acid (PFUDA) CASRN 2058-94-8, Perfluorodecanoic acid (PFDA) CASRN 335-76-2, Perfluorononanoic acid (PFNA) CASRN 375-95-1, Perfluorooctanoic acid (PFOA) CASRN 335-67-1, Perfluorohexanoic acid (PFHxA) CASRN 307-24-4, Perfluorobutanoic acid (PFBA) CASRN 375-22-4, Perfluorooctanesulfonic acid (PFOS) CASRN 1763-23-1, Perfluorohexanesulfonic acid (PFHxS) CASRN 355-46-4, Perfluorobutanesulfonic acid (PFBS) CASRN 375-73-5, 4,8-dioxa-3H-perfluorononanoic acid (DONA) CASRN 919005-14-4, Perfluoro(2-methyl-3-oxahexanoic) acid (HFPO-DA) CASRN 13252-13-6.

The enclosure specifies the information you must submit. You must submit this information by February 18, 2022 to the following address:

Kayla Currie
Attorney-Advisor
U.S. Environmental Protection Agency
Office of Site Remediation and Enforcement
Mail Code 2273A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

You may, under the procedures set forth in Section 104(e)(7) of CERCLA and under 40 C.F.R. Part 2, Subpart B, assert a confidential business information (CBI) (also known as proprietary business information (PBI)) claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). You must assert any CBI claim when you submit the information. **If no CBI claim accompanies the information submitted to EPA, then the Agency may make the information available to the public without further notice.** To request that the Agency treat your information as confidential, you must follow the procedures outlined in Enclosure C. We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2.

You must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading, or incomplete, the signatory should notify the Agency. Any knowing and willful materially false, fictitious, or fraudulent statement or representation is subject to criminal penalty pursuant to 18 U.S.C. § 1001. We may use the requested information in an administrative, civil, or criminal action.

In addition to potential criminal liability for falsification of any response, failure to comply fully with this request for information may result in enforcement proceedings under Section 104(e)(5) of CERCLA. Such an enforcement action could result in the assessment of civil penalties for each day of continued noncompliance. CERCLA Section 104(e)(5)(B)(ii) permits EPA to seek the imposition of penalties up to \$62,689.00² for each day of continued non-compliance. Please note that EPA may exercise discretion in assessing such statutory penalties considering a number of fact-specific considerations such as the seriousness of the violation, the violator's good faith efforts to comply, any economic benefit gained by the violator as a result of noncompliance, and a violator's ability to pay.

² On January 12, 2022, the 2022 Civil Monetary Penalty Adjustment Rule (87 Fed. Reg. 1676) was published and became effective. This Rule was published as mandated by the 1990 Federal Civil Penalties Inflation Adjustment Act, as amended by the 2015 Federal Civil Penalties Inflation Adjustment Act Improvement Act (2015 Act). The 2015 Act prescribes a formula for annually adjusting the statutory maximum (and minimum) amount of civil monetary penalties to reflect inflation, maintain the deterrent effect of statutory civil monetary penalties, and promote compliance with the law. Civil Monetary Penalty Inflation Adjustment, 87 Fed. Reg. 1676 (codified at 40 C.F.R. pt. 19), available at <https://www.govinfo.gov/content/pkg/FR-2022-01-12/pdf/2022-00349.pdf>.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

You may confer with EPA regarding this request for information. The opportunity to confer with EPA may be pursued before the requested information is due to be submitted. You should direct questions, requests to confer about this request for information, or requests to extend the deadline for submitting the information to my staff, Erik Hanselman (202-564-4356; hanselman.erik@epa.gov) or Kayla Currie (202-564-7358; currie.kayla@epa.gov).

Sincerely,

Cynthia L. Mackey, Director
Office of Site Remediation Enforcement
U.S. Environmental Protection Agency

Enclosures

- A. Instructions
- B. Definitions
- C. Confidential Business Information
- D. Information Request
- E. Statement of Certification

cc: Mr. Elliott P. Laws, Counsel for DuPont
Commissioner Basil Seggos, New York Department of Environmental Conservation
Secretary Rafael Machargo, Puerto Rico Department of Natural and Environmental Resources
Commissioner Martin Suuberg, Massachusetts Department of Environmental Protection
Secretary Shawn M. Gavin, Delaware Department of Natural Resources and Environmental Control
Assistant to the Secretary Leslie Reese, Delaware Department of Natural Resources and Environmental Control
Director David K. Paylor, Virginia Department of Environmental Quality
Executive Assistant Elsie Franklin, Virginia Department of Environmental Quality
Secretary Patrick McDonnell, Pennsylvania Department of Environmental Protection
Commissioner David W. Salyers, Tennessee Department of Environment and Conservation
Deputy Commissioner Gregory Young, Tennessee Department of Environment and Conservation
Secretary Elizabeth Biser, North Carolina Department of Environmental Quality
Assistant Secretary Sushma Masemore, North Carolina Department of Environmental Quality
Director Laurie A. Stevenson, Ohio Environmental Protection Agency

Assistant Director Laura Factor, Ohio Environmental Protection Agency
Executive Director Toby Baker, Texas Commission of Environmental Quality
Director of the Office of Compliance and Enforcement Craig Pritzlaff, Texas Commission of Environmental Quality
Land Quality Bureau Chief Amie Davidson, Iowa Department of Natural Resources
Commissioner Shawn La Tourette, New Jersey Department of Environmental Protection
Secretary Harold Ward, West Virginia Department of Environmental Protection
Executive Secretary Gary Burdette, West Virginia Department of Environmental Protection

Enclosure A Instructions

1. Your response to the information requested is due February 18, 2022, unless otherwise specified by EPA in this document.
2. Identify the person(s) responding to each question or subpart of a question in this information request.
3. In preparing your response to each question, consult with all present and former employees and agents of each facility who may be familiar with the matter to which the question pertains.
4. In answering each question, identify all contributing sources of information.
5. Provide a separate narrative response to each and every question and subpart of a question set forth in this information request.
6. Precede each answer with the text and the number of the question and its sub-question to which the answer corresponds.
7. Each document submitted must contain a notation indicating the question and subpart of the question to which it is responsive.
8. In answering each information request question and subpart thereto, identify all documents and persons consulted, examined, or referred in the preparation of each response and provide true and accurate copies of all such documents.
9. If information not known or not available to you as of the date of submission of a response to this information request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the Agency thereof as soon as possible.
10. Where specific information has not been memorialized in a document, but is nonetheless responsive to a question, respond to the question with a written response.
11. Provide all information in your possession that is responsive to this information request, regardless of whether the response relates to your activities or the activities of another entity.
12. If information responsive to this information request is not in your possession, custody, or control, then identify the person(s) from whom such information may be obtained.
13. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive

documents, identify such persons and the additional information or documents that they may have.

14. Provide all documents in NATIVE, searchable electronic format compatible with PDF, MS Excel, or MS Word.
15. Provide any spreadsheet information, if applicable, in NATIVE, searchable electronic format compatible with MS Excel.
16. If any question relates to activities undertaken by entities other than the recipients of this information request, and to the extent that you have information pertaining to such activities, provide such information for each entity.
17. If anything is deleted or redacted from a document produced in response to this Request for Information, state the reason for and the subject matter of the deletion.
18. An authorized representative or responsible person must sign the certification in Enclosure E and return it with the response to this Request for Information.
19. If any questions relate to information that has previously been provided to EPA, please identify when and to whom at EPA the information was provided.

Enclosure B

Definitions

All terms not defined herein shall have their ordinary meanings, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601 or its implementing regulations and Section 1004 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6903 or its implementing regulations, in which case the statutory or regulatory definitions shall control. All terms defined herein are solely for purposes of this information request.

1. The term “DuPont” shall mean DuPont de Nemours, Inc. and any successors or assigns.
2. The term “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed outside its scope.
3. The term “identify” means, with respect to a natural person, to set forth the person’s name, job title, position or business, business address, telephone number, and email address.
4. The term “identify” means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressee and/or recipient, and substance of the subject matter.
5. For the purposes of this information request the term “Chemicals of Potential Concern” or “COPC” shall refer to the following 14 per-and polyfluoroalkyl substances:
 - Perfluorooctadecanoic acid (PFODA) CASRN 16517-11-6,
 - Perfluorotetradecanoic acid (PFTetDA) CASRN 376-06-7,
 - Perfluorododecanoic acid (PFDODA) CASRN 307-55-1,
 - Perfluoroundecanoic acid (PFUDA) CASRN 2058-94-8,
 - Perfluorodecanoic acid (PFDA) CASRN 335-76-2,
 - Perfluorononanoic acid (PFNA) CASRN 375-95-1,
 - Perfluorooctanoic acid (PFOA) CASRN 335-67-1,
 - Perfluorohexanoic acid (PFHxA) CASRN 307-24-4,
 - Perfluorobutanoic acid (PFBA) CASRN 375-22-4,
 - Perfluorooctanesulfonic acid (PFOS) CASRN 1763-23-1,
 - Perfluorohexanesulfonic acid (PFHxS) CASRN 355-46-4,
 - Perfluorobutanesulfonic acid (PFBS) CASRN 375-73-5,
 - 4,8-dioxa-3H-perfluorononanoic acid (DONA) CASRN 919005-14-4,
 - Perfluoro(2-methyl-3-oxahexanoic) acid (HFPO-DA) CASRN 13252-13-6
6. As used herein, the term “hazardous substance” shall have the meaning set forth in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). The substances which have been designated as hazardous substances pursuant to Section 102(a) of CERCLA (which, in turn, comprise a portion of the substances that fall within the definition of "hazardous substance" under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.

7. As used herein, the term “pollutants or contaminants” shall have the meaning set forth in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33).
8. As used herein the terms “disposal,” “storage,” and “treatment” shall have the meanings set forth in Sections 1004(3), (33), and (34) of RCRA, 42 U.S.C. §§ 6903(3), (33), and (34), respectively.
9. As used herein, the term “release” has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
10. As used herein, the term “facility” or “facilities” shall be construed to mean all property on or about the following locations currently or historically associated with or involved in DuPont’s operations, including but not limited to affiliates or other unrelated companies who leased a portion of the facilities.
 - Marlborough, MA
 - Manati, PR
 - Buffalo, NY (Yerkes Plant)
 - Wilmington, DE (Experimental Station)
 - Richmond, VA (Spruance)
 - Towanda, PA
 - Newark, DE (Tralee Park)
 - Old Hickory, TN
 - Greensboro, NC
 - Circleville, OH
 - Pasadena, TX (Bayport)
 - Fort Madison, IA
 - Deepwater, NJ (Chambers Works)
 - Parlin, NJ
 - Washington, WV (Washington Works)
11. The term “waste” or “wastes” shall have the meaning of “solid waste” as set forth in Section 1004(27) of RCRA, 42 U.S.C. § 6903(27).
12. The term “owner or operator” shall have the meaning set forth in Section 101(20) of CERCLA, 42 U.S.C. § 9601(20), and in 40 C.F.R. Part 260.10.
13. The term “You” and “Your” shall mean DuPont and/or its subsidiaries, sister companies, affiliates, and/or any employee, officer, contractor, or agent thereof.
14. “Authorized representative” means the person responsible for the overall operation of each facility or part of a facility, e.g., the plant manager, superintendent or person of equivalent

responsibility. The authorized representative should be authorized to respond on behalf of DuPont.

15. "Certification" means a statement of professional opinion based upon knowledge and belief.
16. "Responsible person" means an officer or agent who is authorized to respond on behalf of DuPont.
17. The terms "document" and "documents" mean any object that records, stores, presents, or transmits information. "Document" shall include, but not be limited to:
 1. writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 - i. invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order;
 - ii. letter, correspondence, fax, telegram, telex, postcard;
 - iii. record book, minutes, memorandum of meetings and telephone and other conversations, telephone messages, inter- or intra-office communications;
 - iv. agreement, contract, and the like;
 - v. logbook, diary, calendar, desk pad, journal, scrapbook;
 - vi. bulletin, circular, form, pamphlet, statement;
 - vii. report, notice, analysis, notebook;
 - viii. graph or chart; or
 - ix. copy of any document.
 - microfilm or other film record, photograph, or sound recording on any type of device;
 - any tape, disc, or other type of memory generally associated with computers and data processing, together with:
 - i. the programming instructions and other written material necessary to use such disc, or disc pack, tape, or other type of memory; and
 - ii. printouts of such disc, or disc pack, tape, or other type of memory; and
 - attachments to, or enclosures with, any document as well as any document referred to in any other document.
18. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

Enclosure C

Confidential Business Information

You may consider some of the information confidential business information or trade secret that U.S. Environmental Protection Agency (EPA or Agency) is requesting. You cannot withhold information or records upon that basis.

You may assert a confidential business information (CBI) claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. (See 41 Federal Register 36902 et seq. (September 1, 1976); 43 Federal Register 4000 et seq. (December 18, 1985).) **If no such claim accompanies the information when the EPA receives it, the information may be made available to the public by the Agency without further notice to you.**

Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601, et seq.; because as stated in Section 104(e)(7)(ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish to assert a CBI claim, you must advise EPA of that fact. To assert a CBI claim, you must specify which portions of the information or documents you consider CBI. Please identify the information or document that you consider CBI by page, paragraph, and sentence. You must make a separate assertion of CBI for each response and each document that you consider CBI. Submit the portion of the response that you consider CBI in a separate, sealed envelope. Mark the envelope “confidential,” and identify the number of the question to which it is the response.

Enclosure D
Information Request

1. Provide the full legal name, mailing address, and business telephone number of DuPont, and each person answering these questions on behalf of DuPont, including title, and business address. If you wish to designate an individual for all future correspondence concerning an individual facility, including any legal notices, please so indicate here by providing that individual's name, address, e-mail, and telephone number.
2. For the entire time each facility has been in operation, identify all owners or operators, including, but not limited to DuPont that have conducted operations involving Chemicals of Potential Concern (COPC) at the facilities subject to this information request. For each such owners or operators, further identify:
 - a. The dates that their operations involving COPC commenced and concluded at each facility for the entire time the facility has been in operation.
 - b. The nature of their operations involving COPC at the facility, including but not limited to the industrial, chemical, or institutional processes undertaken at each facility. If the nature of the operations involving COPC conducted at the facility by the owner or operator was not constant, state the changes that occurred and when those changes occurred.
 - c. All analytical data or monitoring results resulting from any monitoring or sampling of ambient air, surface water, groundwater, soils, or sediments that has ever been performed at the facility to determine the presence of COPC or waste containing COPC at or around the facility.
 - d. Submit all evidence that any COPC and/or waste containing COPC were released or threatened to be released at the facility during the period in which they were operating at the facility.
 - e. The past and current relationship, if any, between the owner or operator and DuPont and timelines for such relationships.
3. For the entire time each facility has been in operation, describe the use, manufacturing, and/or storage of COPC or mixtures containing COPC at each facility. Include in each description:
 - a. The individual COPC used, manufactured, or stored at the facility and the amount of each COPC used, manufactured, or stored each year since it was first introduced at the facility.
 - b. When, where, and in what process the use, manufacturing, and/or storage of COPC occurred.
 - c. If the use, manufacturing, and/or storage of COPC changed over time, please provide dates of such changes and what changes were made.
 - d. Copies of all documents that describe the process by which COPC or mixtures containing COPC are or were handled at the facility.
4. For the entire time each facility has been in operation, identify whether COPC were commingled with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances. In each response, further identify:

- a. When, where, and in what process the CERCLA hazardous substances were generated.
 - b. All evidence that the CERCLA hazardous substances commingled with COPC were released or threatened to be released at the facility.
 - c. All information related to how releases of CERCLA hazardous substances commingled with COPC were managed, remediated, and/or sampled for at the facility.
5. For the entire time each facility has been in operation, list and fully describe all waste streams containing COPC produced by DuPont's operations, including, but not limited to, solid, liquid, or other wastes from pollution abatement equipment. Each response should include:
 - a. A list of the individual COPC found in such waste streams and the quantity of each COPC found in such waste streams.
 - b. A narrative description of any pollution abatement equipment, treatment, and/or pretreatment process applied to the waste containing COPC generated at the facility.
6. For the entire time each facility has been in operation, describe the current and historic storage practices by DuPont for each waste stream containing COPC resulting from DuPont's operations. Each response should include:
 - a. The dates and length of time for the storage of these wastes.
 - b. A description of the waste containers.
 - c. The individual COPC contained in the waste being stored.
7. For the entire time each facility has been in operation, describe and provide all documents that refer or relate to:
 - a. The location, addresses, and name of the facilities where COPC or waste containing COPC were disposed, treated, stored, recycled, or managed.
 - b. The individual COPC and quantity of each individual COPC disposed, treated, stored, recycled, or managed.
 - c. The periods of time during which the disposal, treatment, storage, recycling, or management of COPC or waste containing COPC took place.
 - d. All treatment and/or disposal evaluations related to COPC, such as emissions testing or design information on the treatment and/or disposal methods.
 - e. All intermediate facilities where COPC or wastes containing COPC involved in each arrangement were transferred, or where they were stored or held, any time prior to final treatment or disposal.
8. For the entire time each facility has been in operation, did DuPont send or arrange to send COPC or wastes containing COPC to any third parties for treatment? If so, identify and provide the following:
 - a. The third party.
 - b. The shipment dates.
 - c. A description of the shipment methods.
 - d. The quantity of COPC or wastes containing COPC shipped.
 - e. Any manifests or bills of lading.
 - f. The treatment location including name and address.

- g. A description of the treatment processes.
 - h. The disposition of the COPC or wastes containing COPC.
9. For the entire time each facility has been in operation, were any wastes containing COPC disposed of in onsite or offsite landfills? If so, identify the shipment date, location, and provide a map designating the location, provide the name and address of the landfill operator, and a list of the COPC landfilled at each location.
 10. For the entire time each facility has been in operation, indicate whether DuPont has land applied wastewater treatment plant sludge containing COPC onsite or shipped such sludge offsite to be land applied. If so, identify the shipment date, location of the land application of the sludge, and provide a map designating the location.
 11. For the entire time each facility has been in operation, identify whether wastes containing COPC have been treated through incineration, or any other thermal treatment technique, such as use of thermal oxidizers, by DuPont. If the wastes containing COPC have been treated through incineration or other thermal treatment techniques, provide:
 - a. All records indicating the incineration conditions that would be applicable to the thermal treatment technique (e.g., operating temperatures, residence time, waste feed locations, a general description for how turbulence is maintained in the combustion zone, etc.).
 - b. All information (e.g., emission test results) which could inform on the degree of complete destruction (i.e., complete mineralization) of COPC.
 - c. All information on emissions of products of incomplete combustion related to COPC.
 - d. A description of the incineration or thermal treatment system used, including, as applicable, a description of the air pollution control system, and any data or information on the extent that COPC, or products of incomplete combustion related to COPC, partition to air pollution control media and/or incinerator bottom ash.
 12. For the entire time each facility has been in operation, identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on site where COPC or wastes containing COPC are or have been disposed. For each solid waste management unit, provide the following information:
 - a. A map showing the unit's boundaries and all known solid waste management units whether currently in operation or not. This map should clearly indicate the location and size of all past and present units.
 - b. The type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit.
 - c. The dates that the unit was in use.
 - d. The purpose and past usage (e.g., storage, spill containment, etc.).
 - e. The quantity and types of COPC located in each unit.
 - f. The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.

- g. If the unit is no longer in use, describe the closure method and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.
- 13. For the entire time each facility has been in operation, provide all documents concerning sampling, testing, monitoring, data or other technical or analytical information related to any COPC in surface water, groundwater, soil, air emission, wastewater, or other media at the facility or that has moved beyond the facilities boundaries.
- 14. Identify, describe, and provide EPA with a current version of any other database(s) or other virtual location(s) in DuPont's possession or control that contain information from sampling activities relating to each COPC, including historic data. The database(s) or location(s) must be provided to EPA in the same form that DuPont employees and contractors would receive it.

Enclosure E
Statement of Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to Section 104(e)(5) of CERCLA and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Printed Name)

(Title)

(Date)